

Chelsea L. Davis v. McKool Smith P.C. et al,
3:14-cv-4190 (N.D. Tex. filed Nov. 24, 2014)

**CONTROVERTING AFFIDAVIT, AFFIDAVIT, DECLARATION AND
VERIFICATION**

STATE OF TEXAS §
COUNTY OF DALLAS §

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared Chelsea Lynn Davis, known to me to be the person whose name is subscribed below, and who, after being duly sworn, stated on her oath, making this CONTROVERTING AFFIDAVIT, AFFIDAVIT, DECLARATION and VERIFICATION:

I, Chelsea L. Davis, hereby swear on my oath as follows:

I make this CONTROVERTING AFFIDAVIT, AFFIDAVIT, DECLARATION and VERIFICATION on personal knowledge. I am competent to testify on the matters stated. I present my petition to the judge verified by this affidavit and containing a plain and intelligible statement of the grounds for injunctive relief.

I was previously employed at the location of GECESP Associates LLC's and McKool Smith P.C.'s principal office, where I was sexually harassed to an extreme degree and forced to take off my clothes right there in front of floor to ceiling clear glass windows for Leslie Ware to watch from his office across the street such that the offices of GECESP Associates LLC and McKool Smith P.C. may constitute a public nuisance.

I verifiably oppose the following statements in Gary W. Eden's affidavit concerning GECESP Associates, LLC ("GECESP"). I deny that "GECESP is a limited liability company whose sole purpose is to make investments." I propose that Harlan Crow and/or Crow Holdings Capital Partners LLC has a financial interest in both GECESP Associates LLC and McKool Smith P.C., which is why Samuel Baxter forced me to have sex with Harlan Crow, for profit.

Samuel Baxter and GECESP profit off of Harlan Crow directly or indirectly. For example, Harlan Crow's companies are tenants in properties in which GECESP is landlord.

Centcom/Vista Grove Genpar Inc filed as a Domestic For-Profit Corporation in the State of Texas on Monday, October 29, 2007 appears to be the parent corporation based on filings with the Texas Secretary of State. This company has a direct relationship with John Muse and indirect relationship with Harlan Crow.

GECESP is a limited partner in a real estate partnership known as Centcom/Vista Grove LP, Limited Partnership. McKool Smith P.C. and Harlan Crow appears to have a financial interest in GECESP, and GECESP appears to have a financial interest in McKool Smith P.C. and Harlan Crow's companies or Denmark holdings. Samuel F. Baxter has a financial interest in and affiliation with GECESP. Leslie Ware has a financial interest in and affiliation with GECESP through PanOptis IP LLC or PanOptis LLC.

I move to strike paragraph 3 of Gary Eden's affidavit, or, in the alternative, move to limit the purpose for which the attachments GECESP Exhibit A, GECESP Exhibit B and GECESP Exhibit C are introduced to the purpose of proving the location of my office during 2010. Gary Eden's purpose for introducing these exhibits here was in bad faith.

I deny that "Chelsea L. Davis ("Davis") was hired as an associate attorney by McKool Smith in March 2010." I deny that "GECESP never employed or agreed to employ Davis for any purpose." I object to proof. I deny that "Indeed, as an investment entity, GECESP does not have, nor has it ever had, any employees." I deny the admissibility and relevance of statement "Likewise, Davis never provided any legal services to GECESP, and GECESP never asked Davis to render any legal services to it." I deny the admissibility and relevance of statement

“GECESP never entered into an agreement with Davis to arbitrate any dispute.” I deny the admissibility and relevance of statement “Indeed, GECESP has never entered into any kind of contract or agreement with Davis at all, much less one that includes an arbitration agreement.”

I move for attorney fees as against GECESP for submitting an affidavit in bad faith such that GECESP and any other party excluding myself is liable to pay all of my reasonable expenses, including attorney’s fees, that I have incurred as a result of the fact as alleged in my Complaint at Doc. 1 filed Nov. 21, 2014 (*Chelsea L. Davis v. GECESP Associates LLC*, “Case” 2:14-cv-01065-JRG Document 1 Filed 11/21/14 Page 1 of 11 PageID #: 1).

I verifiably oppose and specifically deny Jolene Bartlett’s affidavit, which I introduce here for the limited purpose of granting injunctive relief against the State Bar of Texas.

I verifiably oppose and specifically deny Susan Farris’s affidavit, which I introduce here for the limited purpose of granting injunctive relief against the State Bar of Texas.

I verifiably oppose and specifically deny Brian S. Lidji’s affidavit, which I introduce here for the limited purpose of granting injunctive relief against the State Bar of Texas.

I verifiably oppose and specifically deny Harlan R. Crow’s affidavit, which I introduce here for the limited purpose of granting injunctive relief against the State Bar of Texas.

I verifiably oppose and specifically deny Leslie Ware’s affidavit, which I introduce here for the limited purpose of granting injunctive relief against the State Bar of Texas.

I verifiably oppose and specifically deny Sam Baxter’s affidavit, which I introduce here for the limited purpose of granting injunctive relief against the State Bar of Texas.

I verifiably oppose and generally and specifically deny allegations against me, if any, in inquiries and complaints, if any, of inexcusable professional misconduct and serious crimes because I am a victim of human trafficking, including allegations in court orders of Judges Jill Willis and Angela Tucker of the 199th and 429th Judicial District Courts, Collin County, Texas, Associate Judge Donald Turner, Judge James Martin of the 254th Judicial District Court, Dallas County, Texas and Judge Emily Tobolowsky, etc of the 298th, 160th, etc. Judicial District Courts of Dallas County, Texas, and by Federal District and Magistrate Judges in the Northern and Eastern Districts of Texas, which I introduce here for the limited purpose of granting injunctive relief against the State Bar of Texas.

I introduce all foregoing and following facts and attachments here for the limited purpose of granting me injunctive relief against the State Bar of Texas and to enjoin all state court proceedings, if any, at least until a court makes a jurisdictional determination by court order, which I request the Northern District of Texas or Eastern District of Texas to enter due to the involvement Honorary Consul Harlan R. Crow. I swear on my oath that Leslie Ware and Harlan Crow traffic women for sex in violation of state and federal anti-human trafficking laws. I am only one of their victims, but I am aware of other victims because I was forced to have threesomes with other women. I do not know their names, but, if permitted to open a discovery period and take Leslie Ware's deposition, I would ask him the names of the other women, and I am sure that he has the contact information of the other women.

The following is listed on the Texas Secretary of State website at <http://www.sos.state.tx.us/border/intlprotocol/embassies/denmark.shtml>, which page is incorporated by reference herein:

The Honorable Harlan Crow

Honorary Consul of Denmark
3819 Maple Ave.
Dallas, TX 75219
Telephone: 214-661-7036
Fax: 214-661-8036

Evidence is listed on my website at <http://www.chelseadavispc.com> and

<http://sites.google.com/a/chelseadavispc.com/lawoffice> at the page entitled “Texas Injustice”, which page and attachments thereto are incorporated by reference herein.

I contest the Constitutionality of Rule 1.12 of the Internal Procedural Rules of the Board of Disciplinary Appeals, which require “An answer to any matter pending before BODA may be filed at any time prior to the day of the hearing on the merits except where expressly provided otherwise by these rules or the TRDP, or when an answer date has been set by prior order of BODA,” but which do not require the Commission for Lawyer Discipline to file a petition prior to any hearing. I cannot defend allegations against me if I must file an answer before I know what it is I am supposed to be answering. This rule violates substantive and procedural due process requirements and the Texas and Federal Rules of Criminal Procedure, along with other rules, laws, etc., depriving me of my rights, liberties, privileges, immunities, waivers, etc.

I am entitled to injunctive relief against state court proceedings because no proceedings were properly instituted against me by the Commission for Lawyer Discipline or Board of Disciplinary Appeals prior to the filing of a complaint against me and no complaint was filed in the name of the Commission for Lawyer Discipline against me before January 30, 2015. However, Angelina Bain, who is a member of a District Grievance Committee and also Leslie Ware and Samuel Baxter’s attorney, appears to have instituted a proceeding against me without standing in spite of her conflict of interest with the intent to goad me, threaten me and scare me.

I was so scared on certain dates on or about January, September and December 2013 that I could not sleep for fear of being raped by a judge who is HIV positive as Samuel Baxter had threatened, kidnapped and killed for exposing what I have been through and the precise details of Leslie Ware and Harlan Crow's human trafficking and pornography operations. These powerful billionaires sexually abused me and defrauded me for years. Then, when I began standing up for myself and trying to sue them, they abused me further through abuse of law or legal process, bribing people, and following through on their threats to seriously harm me, like threatening to put me in jail for crimes I did not commit and financially hurting me further by causing me to pay money in fraudulent bonds and legal fees and costs.

For years, Leslie Ware talked about having sex with twelve year old girls and watching girls have sex with goats and donkeys. Leslie Ware talked about going to an island with Harlan Crow on Harlan Crow's yacht and buying twelve year old virgins for sex. Leslie Ware forced me to drink urine and eat feces and he sexually abused me using sadomasochistic measures. Denmark was the first country to legalize pornography and is home to the largest pornography companies of all time. It is no coincidence that Harlan Crow deals in child or virtual child pornography and is consul to Denmark. Possession of child pornography is not illegal in Denmark, and Harlan Crow, as a consul, has certain immunities from disclosure of documents in his possession. Such immunities should be unconstitutional where the documents at issue consist of child pornography and other pornography taken without the person's consent. I have reason to believe that Harlan Crow videotaped us having sex without my consent. I have specific reasons from my personal experience to believe that I was targeted from the time I was fourteen years of age by Harlan Crow for his human trafficking and pornography operations.

Producers of child pornography try to avoid prosecution by distributing their material across national borders, though this issue is increasingly being addressed with arrests of suspects from a number of countries, but only within the last few years. The prepubescent pornography is viewed and collected by pedophiles for a variety of purposes, ranging from private sexual uses, trading with other pedophiles, preparing children for sexual abuse as part of the process known as "child grooming", or enticement leading to entrapment for sexual exploitation such as production of new child pornography or child prostitution. Children themselves also sometimes produce child pornography by the coercion of an adult. See http://en.wikipedia.org/wiki/Child_pornography.

Child pornography is illegal and censored in most jurisdictions in the world. However, the age of consent varies widely. In Denmark, the age of consent is the lowest - 15. Ninety-four of 187 Interpol member states had laws specifically addressing child pornography as of 2008. Of those 94 countries, only 58 criminalized possession of child pornography regardless of intent to distribute. Both distribution and possession are now criminal offenses in almost all Western countries. A wide movement is working to globalize the criminalization of child pornography, including major international organizations such as the United Nations and the European Commission. However, in Denmark, possession of child pornography is legal.

There has been a push to distribute pornography using people enormous boats, like Harlan Crow's \$100 million dollar yacht, and private jets, like Harlan Crow's Gulfstream, to distribute child pornography, especially from Denmark to Los Angeles, California, and especially using consular's modes of transportation because they are immune from certain searches and seizures.

In the United States, the first federal law to ban the for-profit production and distribution of child pornography was the Protection of Children Against Sexual Exploitation Act of 1977. In response to *New York v. Ferber*, 458 U.S. 747 (1982), a U.S. Supreme Court decision allowing the prohibition of child pornography that did not meet the obscenity standard established in *Miller v. California*, Congress passed the Child Protection Act of 1984, broadening the definition of child pornography and criminalizing nonprofit child pornography trafficking. The 1986 Meese Report found that child pornography was a cause of serious harm; this led to the passage of the Child Sexual Abuse and Pornography Act of 1986, which increased penalties for repeat offenders. See <http://www.wikipedia.com>.

The U.S. Supreme Court decision *Osborne v. Ohio*, 495 U.S. 103 (1990), ruled that the U.S. Constitution allowed prohibition of child pornography possession. The High Court noted that at the time of the decision, 19 U.S. states had laws on their books prohibiting child pornography possession. As of 2015, all 50 U.S. states had such laws. Provisions of the Child Pornography Prevention Act of 1996 that banned virtual child pornography appear to have been struck down in *Ashcroft v. Free Speech Coalition*, 535 U.S. 234 (2002). Congress passed several laws increasing the penalties for child pornography offenses, so that from 1997 to 2007, the mean sentence of child pornography offenders increased from 20.59 months to 91.30 months of confinement, an increase of 443%.^[32] In 2003, Congress passed the PROTECT Act, authorizing lifetime terms of federal supervised release for child pornography offenders;^[33] since U.S. Sentencing Guidelines recommend imposing the maximum term of supervised release for all sex offenders,^[34] this means that a lifetime term of supervised release is recommended for all child pornography offenders. In fiscal year 2010, the average term of supervised release for

non-production offenders was approximately 20 years; the average term of supervised release for offenders sentenced under the production guideline was nearly 27 years.^[35]

The United States Department of Justice estimates that pornographers have recorded the abuse of more than one million children in the United States alone.^[37] There is an increasing trend towards younger victims and greater brutality; according to Flint Waters, an investigator with the federal Internet Crimes Against Children Task Force, "These guys are raping infants and toddlers. You can hear the child crying, pleading for help in the video. It is horrendous."^[38] According to the World Congress against Commercial Sexual Exploitation of Children, "While impossible to obtain accurate data, a perusal of the child pornography readily available on the international market indicates that a significant number of children are being sexually exploited through this medium."

In a study analyzing men arrested for child pornography possession in the United States over a one year period from 2000 to 2001, most had pornographic images of prepubescent children (83%) and images graphically depicting sexual penetration (80%). Approximately 1 in 5 (21%) had images depicting violence such as bondage, rape, or torture and most of those involved images of children who were gagged, bound, blindfolded, or otherwise enduring sadistic sex. More than 1 in 3 (39%) had child-pornography videos with motion and sound.

"Masha's Law," included in the Adam Walsh Child Protection and Safety Act passed in 2006, includes a provision which allows young people 18 and over to sue in civil court those who download pornographic images taken of them when they were children. "Downloading" includes viewing without actual download; many successful prosecutions are completed through using residual images left on the viewer's computer.

Harlan Crow and Leslie Ware repeatedly talked about sadistic and bestial sexual abuse of children where an animal is involved in some form of sexual behaviour with a child, including penetration. Harlan Crow finances judicial campaigns for judges in Texas. It's as if Judge Carlos Cortez's rape of an eight year old child was his right of passage for Harlan Crow, McKool Smith P.C., Jerry Jones and the Dallas Cowboys Football Club Ltd. to finance his judicial campaign and cover up his crimes.

A 2012 U.S. Sentencing Commission report found that child pornography offenders, while "much more likely to be sexually aroused by children than contact sex offenders or the general population", can also have non-sexual motives for collecting child pornography, including initial curiosity, compulsive collecting behaviors, avoidance of stress and dissatisfaction with life, and an ability to create a new and more socially successful identity (within an online community). Some offenders find collecting child pornography enjoyable regardless of whether the images are sexually exciting to them; their interest is in assembling complete sets and organizing the material as a pastime, analogously to what a stamp collector might do.

Harlan Crow is an avid collector of all sorts of things. His house is a museum. He collects statues of emperors and many artifacts of war. Leslie Ware collects magazines and many other things that he buys from Christie's auctions.

Another trend is the growing use of sophisticated security measures and of peer-to-peer networking, in which participants can share files with one another on their computers rather than downloading them from a web site. The groups use encryption and data destruction software to protect the files and screening measures to ensure only authorized participants could enter the

chat room. I have written and filed patent applications on this stuff, although I was not aware of the content of the videos or why they wanted particular video editing tools and payment strategies involving networks of limited liability companies.

Sex sells and these guys are making money. I want all of the profits they made using videos of me without my consent, I want discovery of the videos and I want an injunction prohibiting further distribution of sex tapes of me made without my consent.

I know Leslie Ware probably made about fifty pornography videos of me without my consent, and I believe he edited them to make me look like a child who was calling him Daddy for sales purposes to sexual predators and pedophiles, which puts my safety in imminent danger. Leslie Ware has access to the technology to make pornography games and videos. For example, he and Harlan Crow own the company Agincourt Gaming LLC, which is organized in Delaware, owns patents, and produces and distributes video games. I believe Leslie Ware drugged me on at least one occasion.

Denmark is a center for the production of animal pornography.

Nordic Adult Entertainment is a Danish/Swedish company producing erotic adult film. In 2007 the company was sold to two employees, CEO Danish Lau Laursen and Anders Brodin and a third person, a private investor, who may be Harlan Crow. By 2009 the company has businesses and subsidiaries with production in Sweden, Denmark, Norway and the Netherlands and claims to 60 employees with a turnover of more than 20 million Euros and to have sold about 140 million magazines and books - and produced more than 250 movies with erotic content. The company currently operates numerous web activities including the webshop martinshop and an online service, ix.nu claiming to have 265,000 members, it has shop outlets in

Oslo, Stockholm, Göteborg, Helsingborg and Ullared and publishes a number of magazines including Aktuell Rapport, Cats Magazine and a Swedish version of Hustler.

I have suffered disgusting abuse and am a victim of human trafficking. I move for the immediate disbarment and removal from the bench of all judges who have summarily labeled my causes of action frivolous.

Neither the doctrine of res judicata nor any law, rule or order bars me from litigating my causes of action against any person or entity because I am not a vexatious litigant and I have not yet had any opportunity to litigate in any court.

I was forced, by force, fraud or coercion, to engage in sexual conduct with a billionaire investor in the litigation finance fund that finances McKool Smith P.C.'s patent litigation, Harlan R. Crow.

On or about October 15, 2010, I attended a business meeting with Harlan Crow at the Mansion Bar in Dallas, Texas. At the meeting, the fund manager pushed down the bust and lifted up the hem of my dress for Harlan Crow to see and told Harlan Crow that I was his sex slave. I was paid cash to engage in sexual conduct with Harlan Crow.

Following the meeting, Harlan Crow sent me multiple emails as follows, some of which are attached hereto. On December 22, 2010, Harlan Crow stated, "I like your legs and your clothes off, let me know if you want more, harder, more in you and on you , travel and wilder! Like a group fuck with private photos. I want more of you soon, let's stay in touch"; "Do you want to come by here and have a fuck while everybody is here, now?"; "I want to do us again soon, hope you got done tonight"; "I want you, nude."; "Or do you want to get fucked another time by the guy you are fucking now and have a fresh dick in you at around 10:00 am.


I'd prefer we do it here now, my dick is hard and for you to come in quietly while everybody, including security, is here, get nude ,do it, would be fun. There are plenty of dicks around for you and plenty of pussy for me but this would be risky and erotic".

On January 6, 2011, Harlan Crow stated, "Can we fuck and travel and fuck soon? I want to fuck friday"; "Can we get together for a fuck soon and a plan a trip with multiple fucks with me and maybe others then?"; "Tried to call you < got no response.would like to fuck you in and with abunch of ppppppeople soon."

On January 7, 2011, Harlan stated, "I think we can do some fun and wild things but I need to be in your cunt and in your mouth really soon"; "Will you respond to about when we can fuck and travel and fuck?"; "want you this weekend and to wild, horry are you thinking have your cunt licked nicely and to suck me?".

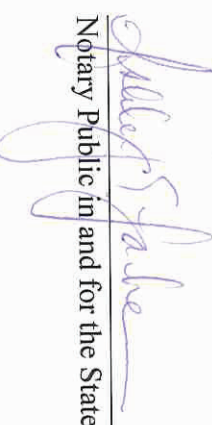
Harlan Crow invested in one or more ventures with McKool Smith P.C., Samuel Baxter, Leslie Ware, and/or Crow Holdings Capital Partners LLC (hereinafter "CHCP"). Leslie Ware paid me to engage in sexual conduct with Harlan Crow.

SIGNED on this the 2ND day of FEBRUARY, 2015.


CHELSEA LYNN DAVIS
Texas Bar No. 24059652
USPTO Reg. No. 63,791

SUBSCRIBED AND SWORN TO BEFORE ME by the said CHELSEA LYNN DAVIS on this the 2ND day of FEBRUARY, 2015, to certify which witness my hand and official seal.




Notary Public in and for the State of Texas